

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY**

**28 U.S.C. § 1746**

Pursuant to 28 U.S.C. § 1746, I, Wilma Bonilla Figueroa, a Special Agent for the United States Department of Homeland Security, Homeland Security Investigations (HSI), declare the following:

**PROFESSIONAL BACKGROUND.**

1. I am a Special Agent of the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), and have been so employed as Special Agent since February 2006. I am currently assigned to the HSI Ponce Office, Ponce, Puerto Rico. I graduated from the Criminal Investigator Training Program and the ICE Special Agent Training at the Federal Law Enforcement Training Center in Glynco, Georgia. I have received training and have participated in criminal investigations into the unlawful importation, possession with intent to distribute, and distribution of controlled substances, along with the laundering of monetary instruments, monetary transactions in property derived from specified unlawful activities and the associated conspiracies to commit such crimes. Additionally, I have received training and have participated in criminal investigations, including financial investigations, among others. Also, I received training and have participated in criminal investigations, including investigations relating to the alleged manufacturing, distributing or possession of controlled substances (21 U.S.C. §§ 841 and 846); importation of controlled substances (21 U.S.C. §§ 952 and 963); smuggling of goods into the United States (18 U.S.C. § 545); false statements (18 U.S.C. §§ 1001); failure to declare the transportation of monetary

instruments in excess of \$10,000 (31 U.S.C. §§ 5316) bulk cash smuggling (31 U.S.C. § 5332), and related offenses, among others.

2. Because this unsworn declaration is submitted for a limited purpose, I have not included details of every aspect of this investigation. I am thoroughly familiar with the information contained in this unsworn declaration, either through personal investigation or through discussions with other law enforcement officers who have interviewed individuals or personally obtained information, which they, in turn, have reported to me.

**ITEM TO BE FORFEITED**

- a. One (1) Gray iPhone, IMEI: 356942210820315,
- b. One (1) White iPhone, IMEI: 352896111684457,
- c. One (1) Gray iPhone S, IMEI: 356137099532509,
- d. One (1) iCOM VHF Marine Transceiver, Model: IC-M73, S/N: 41004266,
- e. One (1) GPS Tracker Family1 APEX 4G, IMEI: 352009117668728,
- f. One (1) Black iPhone with a red cover, IMEI: 354893099508863,

**FACTS**

3. On July 5, 2023, Leandro Alberto AMADIS-EUSEBIO met with an HSI Undercover Agent (UCA) with the purpose of coordinating the transportation of multikilogram of cocaine into Puerto Rico from a foreign country. AMADIS went to the undercover (“UC”) meeting accompanied by a subject identified as Luis FLAT. During the meeting, AMADIS discussed with the UCA the coordination of a drug smuggling venture. The vessel delivering the narcotics for this venture was subsequently interdicted by the USCG on July 31, 2023. The UCA and AMADIS also discussed other future and past drug

smuggling ventures. The UCA posed as a boat captain in his role as an UCA. As part of their agreement, the UCA would depart from Puerto Rico on a vessel to pick up a load of narcotics as agreed at a predetermined sea coordinates from an incoming vessel from a foreign country (a drug sea-transfer). The UCA and AMADIS also agreed that after the successful narcotics sea transfer, the UCA would return to Puerto Rico and would deliver the cocaine to AMADIS and other unknown members of the drug smuggling organization (DSO). It was also agreed that the UCA was going to charge AMADIS a fee per kilogram of cocaine transported into Puerto Rico.

4. AMADIS and the UCA have had numerous meetings and have used the social network application WhatsApp to communicate. The UCA and AMADIS used the WhatsApp platform to coordinate details of the drug smuggling venture interdicted by the USCG on July 31, 2023, and other drug smuggling ventures in which AMADIS served as a coordinator. The phone number of the WhatsApp account used by AMADIS is (215) 509-8810. AMADIS communicated with UCA using WhatsApp with number (215) 509-8810 from on or about July 5, 2023, throughout on or about August 16, 2023. In the communications there were text messages, voice notes and calls. Some of the messages are describe as follows:

- a. On July 6, 2023, AMADIS texted to UCA that the vessel that was going to deliver the narcotics was already on its way. Later, that day, AMADIS texted the UCA that the drug smuggling venture was delayed for the next week. Also, AMADIS texted the UCA that another drug smuggling venture they had discussed in a previous meeting was still going on the agreed date.

b. On July 27, 2023, AMADIS sent an image with a set of sea coordinates and coded communication that the UCA was going to use to identify himself / herself with the crew of the delivering vessel. The set of sea coordinates were 16 12 00 N, 66 35 00 W and the coded communication was “Comunicacion 74 alla Julieta y aqui King” (in English meaning “Communication 74 there Julieta and here King”). This message was informing that the communications were going to be in the radio channel 74 and the passcode for the exchange of narcotics was “Julieta” and “King”. “Julieta” was the vessel delivering the narcotics and “King” the vessel picking up the narcotics.

c. On July 28, 2023, AMADIS sent the UCA a video of the vessel that was going to deliver the narcotics which he later deleted. The vessel depicted in the video was the vessel interdicted by the USCG on July 31, 2023.

d. On July 30, 2023, AMADIS texted the UCA to remember about the video and to tell him when UCA departed. The video that AMADIS mentioned was a video of UCA departing on an UC vessel to the agreed set of sea coordinates to pick up the narcotics.

e. On July 31, 2023, AMADIS texted that the vessel that was going to deliver the narcotics was already at the sea transfer location waiting for UCA. AMADIS also sent voice notes and called the UCA saying that the vessel delivering the cocaine was in the transfer location and described it as a large vessel. AMADIS said by text and voice messages that he was in communication with the delivering vessel, that the delivering vessel was at the transfer location waiting for the UCA to conduct the sea

transfer of narcotics. AMADIS requested the UCA videos to confirm that the UCA was at the sea transfer location.

f. On August 1, 2023, AMADIS texted the UCA requesting a video of the GPS screen of the UCA's vessel showing the route to the predetermined sea transfer location. AMADIS texted the UCA and asked him to communicate with him with the purpose of getting information. AMADIS would pass the information obtained from the UCA to "his friend" (possible owner of the narcotics) and provide an update the situation. AMADIS needed proof from the UCA that UCA was at the sea transfer location and if something happened with the drug shipment was not the UCA's responsibility, therefore, not his.

g. On August 2, 2023, AMADIS texted the UCA that he needed the videos so he could send them to the persons and be in good standing to keep working. The persons that AMADIS referred are the drug suppliers. AMADIS texted the UCA requesting the videos and said that he was under a lot of pressure, that the only evidence they would have were the UCA's videos. The UCA sent AMADIS three (3) videos to make AMADIS believe that he was at the predetermined sea transfer location. After receiving the videos, AMADIS apologized to the UCA and said that they do not distrust the UCA that the UCA know how it is (referring of dealing with narcotics). AMADIS texted the UCA and asked if they could meet the next day. The purpose of this meeting was to coordinate another drug smuggling venture. AMADIS texted the UCA saying that the UCA saved his life by sending the videos.

h. On August 3, 2023, AMADIS sent the UCA an image with a set of coordinates for a drug smuggling venture at 50 nautical miles from Puerto Rico.

- i. On August 4, 2023, AMADIS texted the UCA asking for another set of coordinates at 60 nautical miles from Puerto Rico.
  - j. On August 16, 2023, AMADIS texted the UCA that he was going to change his phone number and that he was going to text the UCA from this other phone, so the UCA knows that it was AMADIS.
5. On August 16, 2023, AMADIS texted UCA using the WhatsApp with the number (847) 413-8167. AMADIS communicated with the UCA using this number from on or about August 16, 2023, throughout on or about September 9, 2023. Below are some of the messages between AMADIS and the UCA using this number:
- a. On August 21, 2023, AMADIS texted the UCA asking for the photos of the coordinates that the UCA had sent him. The coordinates that AMADIS is requesting are the coordinates for a sea transfer of narcotics AMADIS was coordinating which the UCA was going to pick up. The UCA sent AMADIS the set of sea coordinates 16 41 00, 66 52 00.
  - b. On August 22, 2023, AMADIS texted the UCA because the coordinates the UCA sent him did not have the letters. The UCA sent the coordinates 16 41 00 N, 66 52 00 W. AMADIS texted the UCA that they were almost ready and that he was going to call the UCA to see him.
  - c. On August 23, 2023, AMADIS texted the UCA that he needed to see him/her and asked the UCA if he/she talked to his/her crew. AMADIS texted the UCA to tell that they (referring to the DSO) were waiting for his/her response, so, they could depart (referring to the vessel that will deliver the narcotics).

d. On August 25, 2023, AMADIS texted the UCA that he was coordinating a drug smuggling venture with another person that the UCA had already seen.

e. On August 30, 2023, AMADIS texted the UCA that he needed to see him/her. The UCA texted how everything was going, and AMADIS replied that everything was positive, that they (referring to the DSO) were waiting for the UCA.

6. On August 8, 2023, the UCA met AMADIS. AMADIS went to the UC meeting accompanied by another male (not identified). Both subjects arrived in a Toyota Tacoma pick up truck with license plate number 956799. Record checks for this vehicle revealed that it is registered to AMADIS. During the meeting, it was discussed future drug smuggling ventures being coordinated by AMADIS and the other male. Also, the UCA and AMADIS discussed the drug smuggling venture involving the vessel that was interdicted by the USCG on July 31, 2023. During the meeting, UCA observed that AMADIS and the other male had a bulge under their shirts at the waistline area and that they adjusted that area several times. Based in the UCA knowledge and experience the bulge on AMADIS' and the other male's waistline and the movement they did to adjust that bulge is consistent with the carrying of firearms.

7. On September 1, 2023, the UCA met with AMADIS who was accompanied by a subject identified as Luis FLAT. During this meeting, AMADIS discussed a new drug smuggling venture. The narcotics load on this venture would come in a cargo ship and AMADIS wanted to hire the UCA to pick up the narcotics load as well as other future drug smuggling ventures. As the conversation progressed, AMADIS told the UCA that he had the court documents of the arrest of the crew members that participated in the failed drug

smuggling venture of July 31, 2023. AMADIS was searching on his phone for the documents to show them to the UCA.

8. On August 18, 2023, HSI served an administrative subpoena to T-Mobile for subscriber information of phone number 857-413-8167. Return on the subpoena revealed no subscriber information, the number is for a Tracfone that was activated on August 2, 2023. Based on my training and experience, persons involved in illegal criminal activities, to include drug smuggling, use prepaid phones to avoid law enforcement detection.

9. On July 24, 2023, HSI served an administrative subpoena to T-Mobile for subscriber information of the phone number 215-509-8810. Return on the subpoena revealed no subscriber information, the number is for a Tracfone that was activated on June 18, 2023. Based on my training and experience, persons involved in illegal criminal activities, to include drug trafficking, uses prepaid phones to avoid law enforcement detection.

10. On June 20, 2023, HSI served an administrative subpoena to Puerto Rico Telephone Company doing business as Claro Puerto Rico for subscriber information of the phone number 787-317-9907. This phone number is the one AMADIS used for his firearm permit records. Return on the subpoena revealed that AMADIS is the subscriber, and the account has been in service since September 2016. On several occasions AMADIS tried to communicate with the UCA using this phone number. Further investigation revealed that AMADIS also used this phone number in the drug trafficking event that occurred in 2022 and charged in case 23-331(GMM).

11. On September 15, 2023, HSI agents obtained a search and seizure warrant (23-995(M) to search the residence of Leandro Alberto Amadis-Eusebio located at Fraidellanos Ward, Los Baez Sector, F Street #13, Guaynabo, Puerto Rico for evidence related to



violations 21 U.S.C. §§ 952(a), 960(a)(1) and (b)(1)(B)(ii), etc. HSI agents executed the search and seizure warrant on September 18, 2023.

12. The below subject items subject to forfeiture were seized on September 18, 2023, from Leandro Alberto Amadis-Eusebio at his residence in Fraidellanos Ward, Los Baez Sector, F Street #13, Guaynabo, Puerto Rico. On that day and at the same residence, DEA agents with the assistance of HSI agents arrested Amadis-Eusebio for a drug trafficking event that occurred in 2022 and charged in case 23-331(GMM) that was investigated by Drug Enforcement Administration (DEA). On November 30, 2023, a superseding indictment was issued in the case 23-298 (GMM) and Amadis-Eusebio was charged for the drug trafficking event that occurred in July 2023 that was been investigated by HSI. On December 8, 2023, HSI agents executed the arrest warrant of Amadis-Eusebio.

Based on my training and experience, and the facts concerning this investigation, I respectfully believe that sufficient probable cause exists to show that there is material evidence present of the commission of violations of a Federal Law, to wit: 21 USC §§ 881(a)(5), (a)(6), and 853(a)(2), and 18 U.S.C. § 981 (a)(1)(A); giving rise to the forfeiture of the

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f. One (1) Black iPhone with a red cover, IMEI: 354893099508863,

I declare under penalty of perjury that the foregoing is true and correct.

Executed in San Juan, Puerto Rico this 12<sup>th</sup> day of March 2024.

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Wilma Bonilla Figueroa  
HSI Special Agent